

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
CLEVELAND DIVISION

UNITED STATES OF AMERICA,)	CRIMINAL NO.: 1:21-cr-226
)	
Plaintiff,)	
)	JUDGE PAMELA A. BARKER
vs.)	
)	
)	
DAVIS LU,)	
)	
Defendant.)	

DEFENDANT'S WITNESS LIST

Now comes the Defendant, by and through undersigned counsel, Friedman, Nemecek, Long & Grant, L.L.C., and hereby submits the attached Proposed Witness List in accordance with the Court's standing Criminal Pre-Trial Order. Mr. Lu herein incorporates the Government's anticipated witness list, along with all individuals referenced in the Government's discovery and reserves the right to supplement as needed based upon the evidence provided by the United States. The Defense submits this Witness List per Court Order, prior to receipt of the Government's Witness List and/or Exhibit List.

Respectfully submitted,

Dated: July 15, 2024

/s/ Eric C. Nemecek
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Witness List was filed by CM/ECF on the 15th day of July, 2024, which will send a notification of such filing electronically to the following: Brian Deckert, Assistant United States Attorney, 801 Superior Avenue, Cleveland, OH 44113.

Respectfully submitted,

/s/ Eric C. Nemecek

ERIC C. NEMECEK

IAN N. FRIEDMAN

Counsel for Defendant

United States of America

vs.

CASE NO. 1:21-cr-226

Davis Lu

JUDGE PAMELA BARKER

DEFENDANT'S WITNESS LIST

NAME	SYNOPSIS OF TESTIMONY
Warner Scheyer	Expert witness who will testimony concerning several allegations set forth in the Indictment, including claims related to the specific programs/codes that the Government contends caused damage to the protected computers in this case. Mr. Scheyer's testimony is predicated upon evidence that was produced in discovery as well as his own personal and professional knowledge and experience. His opinions and qualifications are set forth in an expert report, which was previously provided to the Government.
Haiyan Pan	Has been married to Mr. Lu for approximately 25 years, including his entire tenure with Eaton. Mrs. Pan will testify concerning pertinent character traits of her husband as well as relevant factual information concerning the allegations set forth in the Indictment.